WINSTON & STRAW

VIA ECF

NORTH AMERICA SOUTH AMERICA EUROPE ASIA

200 Park Avenue New York, NY 10166-4193 +1 212-294-6700 +1 212-294-4700

New York Managing Partner

Time to answer extended to April 17.

Initial conference is adjourned from April 7

to May 5, 2025 at 10:00 a.m. Call-In: 855-244-8681; Access Code: 2305 810 3970#.

+1 212-294-3564 KPadmanabhan@winston.com

KRISHNAN PADMANABHAN

SO ORDERED.

March 10, 2025 Dated: 3/11/2025

P. Kevin Castel

United States District Judge

The Honorable P. Kevin Castel United States District Court Southern District of New York 500 Pearl St. New York, NY 10007-1316

Consent Letter-Motion - Request for Extension of Time to Answer Complaint and Re: Request to Adjourn Conference - Random Chat, LLC v. Freshworks Inc. (1:25-cv-00964-PKC)

Dear Judge Castel:

We represent Defendant Freshworks Inc. in Random Chat, LLC v. Freshworks Inc. (1:25cv-00964-PKC). We write to respectfully request a 30-day extension of time to the deadline to answer or otherwise respond to the Plaintiff Random Chat, LLC's Complaint.

Docket No. 9 sets for a deadline of March 18, 2025 for Defendant to answer or otherwise respond. Defendant respectfully requests that this deadline be extended thirty days to April 17, 2025. Defendant has not previously requested or received any prior extensions of time. Counsel for Plaintiff provided consent to this extension on March 7, 2025.

In accordance with Rule 1.C.vii of Individual Practice in Civil Cases, Defendant additionally requests to adjourn the initial conference to a date at least 14 days after April 17, 2025. Docket No. 8 sets forth an initial conference date of April 7, 2025 at 11:00 A.M. Defendant requests an initial conference date after May 1, 2025.

Accordingly, Defendant respectfully requests for this extension of time to answer the Complaint and adjournment of the initial conference be granted.

Respectfully submitted,

/s/ Krishnan Padmanabhan

Krishnan Padmanabhan

Counsel for Defendant Freshworks Inc.



ReLine March 10, 2025 Page 2

cc: Rex Mann (pro hac vice forthcoming) (rmann@winston.com)
Jacob Ladd (pro hac vice forthcoming) (jladd@winston.com)
Counsel for Defendant Freshworks Inc.

David Hoffman (djhoffman@djhoffmanlaw.com) William Ramey (wramey@rameyfirm.com) Counsel for Plaintiff Random Chat, LLC